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NO. 81-1025

IN THE

SUPREME COURT OF THE UNITED STATES

October 1981 Term

NERCELIA WATTS AND THE DEVISEES
OF DAN STEPNEY, DECEASED

PETITIONERS

VERSUS

WILLIE W. COOK, CHARLES BUTLER COOK,
GLYN PORTER AND WARREN H. COOK

RESPONDENTS

On Petition for Certiorari to the Supreme Court of the United States from the Supreme Court of Mississippi

PETITION FOR CERTIORARI

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QUESTION PRESENTED

Whether a State Court may within the bounds of Amendment XIV of the United States Constitution deny true owners the right to quiet and confirm their title to real property, on the affirmative defense of adverse possession asserted by the joint holders of a void warranty deed, where one admits under oath that he has never possessed the land continuously for any purpose, either individually or through agents; another admits that he had been a nonresident of the State of Mississippi for the entire term of the purported ownership and has not spent more than thirty (30) days each year on the property individually and never through any agents, and the other stated under oath that he has attempted to use the property but has felt that he had a one-third (1/3) interest and has not attempted to act either in concert or as an agent for the other two?

PARTIES

The parties to this action are: (1) Nercelia Watts, (2) Dan Stepney, Jr., (3) Maggie Lee Stepney, (4) Mollie Stepney Whitlow, (5) Nercelia Stepney Crowther, (6) Eva King, (7) Sally Mickels, (8) Cathana Jefferson, (9) Mary Crowther, (10) Martha Stepney McFarland, and (11) Fester Paul Stepney - Petitioners; and (1) Warren H. Cook, (2) Willie W. Cook, (3) Charles Butler Cook, and (4) Glyn Belton Porter - Respondents.

STATEMENT CONCERNING CASE REPORT

The case referred to this Court for consideration was affirmed without a written decision from the Mississippi Supreme Court and petitioners were unable to find a notation in the State's official Reporter of the decision or the action on the Petition for Rehearing.

STATEMENT OF GROUNDS FOR JURISDICTION

A final judgment was entered in the Supreme Court of the State of Mississippi on the 22nd day of July, 1981, affirming a decision of the Chancery Court of Marion County, Mississippi entered on the 28th day of July A. D. 1980. A Petition for Rehearing was timely filed by the petitioners herein on the 6th day of August, 1981, which was denied on the 2nd day of September, A. D. 1981.

The jurisdiction of the Court is being invoked pursuant to 28 U.S.C. 1257(3).

CONSTITUTIONAL PROVISIONS

Petitioners filed an action in the Chancery Court of Marion County, Mississippi requesting that their title be quieted and confirmed pursuant to Section 11-17-29 of the Mississippi Code of 1972, as amended. Respondents replied and asserted Section

15-1-13 of the Mississippi Code of 1972, as amended as an affirmative defense to the action. It is the position of the petitioners that the application of Section 15-1-13 to this set of facts served to deprive petitioners of their property under Amendment Fourteen of the United States Constitution.

The above statutes are as follows:

> Mississippi Code Ann. 1972, as amended Section 11-17-29. Any other title may be confirmed.
>
> The owner in possession of any land, or the owner thereof who may be out of possession, if there be no adverse occupancy thereof, may file a bill in the Chancery Court to have his title confirmed and quieted. The law for notice, process, proceedings, and practice, as provided for confirming and quieting tax titles shall apply, no matter by what tenure the complainant may hold. Unknown and non-resident parties may be made defendants as they are made defendants to proceedings to confirm tax titles. If on the final hearing of any such suit, the Court shall be satisfied that the complainant is the real owner of the land, it shall so adjudge, and its decree shall be conclusive evidence of the title as determined from the date of the decree as against all

parties defendant.

Mississippi Code Ann. 1972, as amended Section 15-1-13. Ten Years' Adverse Possession Gives Title.

Ten years' actual adverse possession by any person claiming to be the owner for that time of any land, uninterruptedly continued for ten years by occupancy, descent, conveyance, or otherwise, in whatever way such occupancy may have commenced or continued, shall vest in every actual occupant or possessor of such land a full and complete title, saving to persons under the disability, as provided in Section 15-1-7. However, the saving in favor of persons under disability of unsoundness of mind shall never extend longer than thirty-one years.

Constitution of the United States, Amendment XIV

Section 1. All persons born or naturalized in the United States and subject to the jurisdiction thereof are citizens of the States wherein he reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisidiction the equal protection of the laws.

STATEMENT OF CASES

Samuel Sipp, late of Marion County, Mississippi, departed this life in the latter

1800's or early 1900's seized of approximately 160 acres of land in south Marion County near Lampton Community. At the time of his death, he owed a small debt to one G. H. McMorrough and E. H. Mounger. A foreclosure was had following his death and the property was sold to one E. H. Mounger. Steven Sipp, one of Samuel Sipp's eldest sons, paid the indebtedness in or about the year of 1908, and received a Deed from E. H. Mounger to the property. Steven Sipp used this property until his death sometime in the late 1930's. Following his death, apparently serious disputes arose concerning the title to this property. On November 16, 1950, the Chancery Court of Marion County, Mississippi acting with complete jursidiction over the parties and the subject matter entered its Decree confirming title to the 160 acres in Ada Sipp, the only heir at law of Steven Sipp. This Decree was duly re-

corded and indexed in the Land Deed Records in Marion County, Mississippi. Ada Sipp is the common source through which both the petitioners and respondents to this lawsuit claim.

On November 17, 1950, one day after the above mentioned Decree of Confirmation, Ada Sipp conveyed the following property to Nercelia Watts, Dan Stepney, Tom Sipp, Saphronia Jefferson, and Luther Green as tenants in common:

> The SW¼ of the NW¼, and West Half of the NW¼ of the NW¼ of Section 34, Township 3N, Range 18W, Marion County, Mississippi.

That land was a part and parcel of the land which had been confirmed in Ada Sipp the day before. Dan Stepney then immediately began to farm the sixty (60) acres mentioned above and continued to do so until his testate death in 1964. All of the tenants in common to this land continued

to own their undivided interest and simply allowed Dan Stepney to use and possess it except Tom Sipp, who conveyed his undivided interest to Dan Stepney on January 24, 1952. Both Saphronia Jefferson and Luther Green died intestate in the 1950's leaving as their closest relative and heir at law according to the Civil Law, their aunt, Nercelia Watts, who is a petitioner herein. In or about June 1962, the heirs at law of Ada Sipp, deceased, attempted to convey the entire 160 acre tract formerly owned by Sam and Steven Sipp, to Willie W. Cook, Charles Butler Cook, and Glyn Porter, who are respondents herein along with Warren H. Cook.

Following the testate death of Dan Stepney in 1964, his daughter and son-in-law, Mattie Stepney Battee and Henry Battee, used the 60 acres in question for various farming purposes. Prior to their farming the land,

the Executrix of the estate of Dan Stepney, Sr., Maggie Lee Stepney, petitioned the Chancery Court of Marion County, Mississippi and received authority to cultivate the lands in question to liquidate the debts and estate. In or about the year 1967, the Battees ceased to use the property for farming purposes and sought other avenues of income. Immediately thereafter, petitioners encountered Warren H. Cook, respondent herein, cutting hay on the property. Maggie Lee Stepney then relayed this incident to the Honorable Bernard Calendar, who was then serving as attorney for her in her capacity as Executrix of the Estate of Dan Stepney, Sr.. Attorney Calendar agreed to investigate the matter for them and did not give them an answer for nearly a year. Finally, upon the insistence of Maggie Lee Stepney and Dan Stepney, Jr., the Honorable Bernard C. Calendar informed them that they seek

counsel elsewhere.

Maggie Lee Stepney, along with other of the petitioners and one Albert James, a grandson of Samuel Sipp and cousin of Dan Stepney, Sr. sought the service of the Honorable William V. Murray, Attorney at Law, Hattiesburg, Mississippi, about this problem. Attorney Murray agreed to represent them, quoted and received a fee and immediately embarked upon the investigation of this matter. Mr. Murray decided to file an action to have Albert James appointed Administrator of the estate of his grandfather, Samuel Sipp, deceased. Following the traditional Notice to Creditors, etc., Attorney William V. Murray secured an Order from the Chancery Court of Marion County, Mississippi allowing him to bring suit on behalf of the heirs at law of Samuel Sipp, in the name of the Administrator. Mr. Murray then employed Sellers and

and Associates of Hattiesburg, Mississippi to conduct an extensive survey of the property which was completed on or about August 15, 1972. The engineers conducted the survey and placed markers on the property which were clearly visible and which were seen by the respondents on occasions. On April 23, 1973, an action was filed in the Chancery Court of Marion County, Mississippi styled Albert James, Administrator of the Estate of Samuel Sipp, Deceased, Versus, Warren H. Cook, Cause No. 14,490. This lawsuit was to remove clouds on the land described as the NW¼ of the NW¼ and the North Half of the NW¼ of the SW¼ of the NE¼ of Section 34, Township 3 North, Range 18 West, Marion County, Mississippi, which of course included the property in question at this time. The matter continued until it was dismissed without prejudice on July 31, 1974. The estate of Samuel Sipp re-

mained open until June 30, 1975, when it was closed by the court upon Motion of the Clerk, obviously as a stale case following the death of Arrorney William V. Murray, Counsel of record.

The Estate of Dan Stepney, Sr., having been opened in 1964 immediately after Mr. Stepney's death, remained open until November, 1978, when a Final Account and Order Discharging Executrix was filed, Petitioners were the Devisees under this Estate and filed this action along with the other co-tenants immediately following the finalization of this Estate.

STATEMENT CONCERNING FEDERAL QUESTION

It is not the position of the petitioners that the Mississippi Statute of Adverse Possession is unconstitutional, but that it provides for a taking of ones property and therefore must be strictly construed and adhered to, otherwise it will result in a

taking contrary to the Fourteenth Amendment of the United States Constitution. The issue of the statue being inapplicable was first raised when the respondents asserted their defenses of Adverse Possession and petitioners denied them. (Trial Court Record 31-37, 46, 53-59, 61-63). The issue was again brought to the Court's attention by motion to exclude the respondents evidence and rule for petitioners, which was denied. (Record 369-376). This was again asserted in Petitioners Trial Brief, shown at Record pages 377-388 in the trial court. This was the subject of the first proposition of Petitioners Brief in the Supreme Court of the State of Mississippi, and the sole ground offered in the Petition for Rehearing which also was denied.

ARGUMENT

The question presented for review by Certiorari is one that petitioners believe

to be in serious need of a legal pronouncement from this Court. The question more simply stated is the Constitutional remifications of a Court of Law taking property from owners who might not have put it to all of the use to which it was suited and awarded it to persons who admittedly put it to no continuous use at all, either individually or through any agents.

Most if not all of the states of the Union have statutory provisions which provide a period of limitation to cure defects in land titles, commonly referred to as "Statutes of Adverse Possession:. Except for varying time limits between the States, all of the statutes basically provide that an owner who allows another to use his real property without his consent loses this real property to the adverse user for inaction.

> In order for title to ripen in a claimant by adverse possession, the occupancy must be actual, adverse, hostile, exclusive, peaceful, uninterruptedly and continuous, under claim of ownership, open, notorious and visable for the statutory period of years. Eady v. Eady 362 So. 2d 830 (Miss. 1978), 833, Kayser v. Dixon 309 So. 2d 522 (Miss. 1975), 528

The law does not require that the occupancy of the adverse user to be his very own, but it may be done by an agent, assignee or vendee. Cox v. Richardson, et. al. 186 Miss. 587, 191 So. 99 (1939), 104.

The precise issue here is that the Respondent, Glyn B. Porter testified in the Trial Court that he had never used the property at all, either individually or through any agents, neither had either of the other two persons claiming interest in this property used the property for him; as to the Respondent Charles Butler Cook, he testified that he had been a resident

of Louisiana and had never spent more than thirty (30) days on the property during any one year and when he was not there, the property was vacant. It is the contention of the petitioners that to apply the statute of adverse possession to deprive them of their land and give it to these respondents would serve to deprive them of their property without due process of law. We therefore urge this Court to review this decision and reverse the decision as to the 2/3 interest given to theses respondents at the very least.

As to the Respondent, Willie W. Cook, we further assert that his case falls in a different category, and comes closer to the standard set in "adverse possession" cases, however, it fails to measure up completely. We assert that as the records show, his possession was not exclusive as is required by law, because the petitioners

also used the property until less than ten years before the filing of this lawsuit.

We, therefore, respectfully request this Court to grant Certiorari and allow this area of the law to be fully briefed and argued, and further to render a decision on the merits for authority in cases where the adverse possession of more than one person is asserted.

Respectfully submitted, this the 28 day of November, A. D. 1981.

John H. Anderson

JOHN H. ANDERSON

ATTORNEY FOR PETITIONERS

CHANCERY COURT
TENTH CHANCERY COURT DISTRICT OF MISSISSIPPI
(FORREST, LARMAR, MARION,
PEARL RIVER & PERRY COUNTIES)

HOWARD L. PATTERSON, JR.
Chancellor - Place One
607 South 34th Avenue
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SEBE DALE, JR.
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P. O. Box 1851
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June 27, 1981

Honorable John Anderson
Attorney at Law
713 Ronie Street
Hattiesburg, MS 39401

Honorable Garland Upton
Attorney at Law
Post Office Box 865
Columbia, MS 39429

RE: Watts Vs Cook
Cause No. 17,489

Gentlemen:

Complainant's motion is overruled. No fiduciary relationship existed between the parties, so cases cited by Complainant do not apply.

The relief sought by Complainants is denied. Defendants and Cross-Complainants have proved adverse possession by clear and convincing evidence.

Mr. Upton is to draw a decree and submit it to Mr. Anderson for review. Mr. Anderson is to provide the decree to me for signature.

The case was well tried and briefed gentlemen, for which I thank you.

Sincerely,

s/Michael Sullivan
Michael Sullivan
CHANCELLOR

MS/cs

IN THE CHANCERY COURT OF MARION COUNTY,
MISSISSIPPI

NERCELIA WATTS AND THE DEVISEES
OF DAN STEPNEY, SR., DECEASED

COMPLAINANTS

VERSUS CAUSE NO. 17,489

WILLIE W. COOK, ET. AL.,

DEFENDANTS

FINAL DECREE

THIS CAUSE THIS DAY came to Court to be heard, the same being a day in Vacation, the matter having been set by the Court with concurrence of both parties to be heard on the Bill of Complaint of the Complainants, the Amended Bill of Complaint of the Complainants, the Answer of the Defendants, Willie W. Cook, Charles Butler Cook, and Glyn Porter, together with affirmative matter plead by said Defendants, the Answer of the Complainants to the

to the affirmative matter and a Decree Pro Confesso against Warren H. Cook in favor of the Complainants and the Court having listened to the testimony of witnesses in open Court, being well and sufficiently advised, doth find, determine and adjudicate as follows, to-wit:

I.

That this Court has jurisdiction of the parties and the subject matter of this cause of action.

II.

That the complainants are the record title holders of that certain tract of land described as follows, to-wit:

> The Southwest Quarter (SW¼) of the Northeast Quarter (NE¼) and the West Half (W½) of the Northwest Quarter (NW¼) of the Northwest Quarter (NW¼) of Section 34, Township 3 North, Range 18 West, Marion County, Mississippi.

that despite their record ownership, this land has been susceptible to adverse possession and the complainants have been

susceptible to having their interest held adversely to them for a period of more than ten (10) years next preceding the commencement of this action; that the defendants have shown to this Court by clear and convincing evidence that they have held the land against the complainants in a manner which was open, hostile, visible, continuous adverse and uninterrupted for more than ten (10) years next preceding the commencement of this action and therefory the complainants are not entitled to any of the relief which they seek.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the Motion made by the complainants at the conclusion of the hearing of this matter be, and the same is hereby denied.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the Bill of Complaint and the Amended Bill of Complaint filed herein

to the refiling hereof, be, and the same is hereby dismissed with full prejudice at the cost of the complainants.

SO ORDERED, ADJUDGED AND DECREED, on this the s/28 day of s/July, A. D. 1980.

s/Michael Sullivan
CHANCELLOR

s/ This is a true and correct copy

s/ This the s/6th day of s/Aug. 19s/80

s/CODY M. BUCKLEY
s/CHANCERY CLERK

s/BY:Sharon C. Person, D.C.

s/(S E A L)

APPROVED AS TO FORM BY:

s/JOHN H. ANDERSON
JOHN H. ANDERSON
Attorney and Counselor at Law
713 Ronie Street
Hattiesburg, Mississippi 39401

SOLICITOR FOR COMPLAINANTS

s/GARLAND D. UPTON
GARLAND D. UPTON
Attorney at Law
1 Court Square

Columbia, Mississippi 39429

SOLICITOR FOR DEFENDANTS

IN THE SUPREME COURT OF MISSISSIPPI
DECISIONS HANDED DOWN JULY 22, 1981

HAWKINS, J.

X 52,508 Kay W. Jackson Westmoreland v. Andrew Roland Jackson; Chancery, Pike; Reversed and Remanded.

X 52,789 Robert E. Ratliff Company, Inc. v. Mississippi State Highway Commission; Chancery, Grenada; Affirmed.

LEE, J.

X 52,679 Michael Henderson v. State; Circuit, Madison; Conviction of Armed Robbery and Sentence of Forty-One (41) Years. Affirmed.

BROOM, J.

52,688 Walter Ray Sutton v. State; Circuit, Hinds; Conviction of Carrying Concealed Weapon and Sentence of Five (5) Year Affirmed.

WALKER, J.

52,744 Nercelia Watts and Devisees of Dan Stephney, Sr., Deceased v. Willie W. Cook, et al.; Chancery, Marion Affirmed.

Misc. #1139-B Gary L. Butler v. Circuit Court of Harrison County; Petition for Appeal from Trial Court's Finding that Petitioner was not Entitled to an Out-Of-Time Appeal Sustained.

Misc. #1207 James Edward Owen v. State and Circuit Court of Jackson County; Petition for Writ of Habeas Corpus Denied.

SUGG, J.

52,730 James Walter Draper v. State; Circuit, Jackson Conviction of Simple Assault on a Police Officer and Sentence Five (5) Years Affirmed.

ROBERTSON, P. J.

52,717 Tommy Moore & Janice Moore v. Jesco, Inc.; Chancery, Lee; Affirmed.

52,750 David L. May, et al. Trustees of Warren County School District v. Marion Williams, et al.; Chancery, Warren; Affirmed.

X, Misc. William R. Robertson, a Minor v. Joan Marie Evans; Chancery, George; Petition for Appeal for Interlocutory Decree Denied but Cause Remanded with Directions.

SMITH, P. J.

X 52,509 E. L. Figg v. Bert Cupie, Jr., Barbara Cupit Wettach & Sandra Cupit Bailey; Chancery, Jefferson; Reversed and Rendered.

52,379 Robert L. Shuler v. Delta Electric Power Association; Circuit, Tallahatchie; Affirmed.

PATTERSON, C. J.

XX 52,333 Kerr-McGee Corporation & Home Insurance Co. v. Tommy Hutto, Deceased, Dependent of; Circuit, Jackson; Affirmed. Sugg.,Lee, Bowling and Hawkins, J J., Concur; Walker, J., Smith, P. J., Robertson, P. J., and Broom, J., Dissent.

52,678 Sarah E. Kyles v. Lehman W. Tanner; Circuit, Jackson; Affirmed.

IN THE SUPREME COURT OF MISSISSIPPI
DECISIONS HANDED DOWN SEPTEMBER 2, 1981
(Continued Page Three)

The Court Sitting En Banc, Continued:

52,744 Nercelia Watts and Devisees of Dan Stepney, Dec'd v. William W. Cook et al.; Chancery, Marion; Petition for Rehearing Denied.

52,747 Ronald Glenn Simms vs. State; Circuit, Coahoma; Petition for Rehearing Denied.

52,760 Rosato Clothing Mfg., Inc. and Aetna Casualty & Surety Co. v. Annie Lorene Cowley; Circuit, Lee; Petition for Rehearing Denied.

Misc. #1065B Wilbur B. McKee, Jr. v. State; Motion for Rehearing Petition for Writ of Erro Coram Nobis Denied.

Misc. #1189 William R. Robertson, a Minor v. Joan Marie Evans; Chancery, George; Petition for Rehearing Denied.

Misc. #1214 Helen Thomas v. State; Petition for Writ of Error Coram Nobis Denied.

PER CURIAM

52,567 Doyle Valentine v. State; Motion to Withdraw Exhibits Sustained.

52,805 Marlon Joe Pace and Glendle Ray Sones v. State; Motion to Allow Counsel for Appellant Sones to Argue for Appellant Pace Sustained.

52,853 Jerry L. Norman v. State; Motion of Appellee to Dismiss Appellant's Petition for Writ of Habeas Corpus Sustained. Motion of Appellant to Dismiss Counsel Overruled.

52,993 Ralph Washington v. State; Petition for Appeal Bond Pending Appeal Denied.

53,047 Fred William Andrews v. State; Motion to Dismiss Scira Facias Sustained.

53,098 Joseph M. Marr v. Jane W. Marr; Motion to Strike Abstract Sustained; Appellant shall have 20 days to File Proper Abstract Ommitting all "Comment or Emphasis" Pursuant to Supreme Court Rule 41. See, Hamilton v. Poteet, 343 So. 2d 1222 (Miss. 1977). Appellee shall have 20 days after Appellant Files Proper Abstract to File her Brief.

53,149 In the Matter of the Last Will and Testament of Nan M. Frances, Deceased; W. L. Holmes, Jr., Administrator; Lee J. Hall, Harold Schilling and Charles Wilkison v. Gene Francis, Et Al; Suggestions of Diminution of Record Granted and Appellees Granted 20 days within which to file their Brief.

53,202 Jessie Lee Lewis v. State; Appeal Dismissed on Motion of the Court of Lace Prosecution.

CERTIFICATE OF SERVICE

I, John H. Anderson, a member of the Bar of the United States do hereby certify that I have caused three (3) true and exact copies of the above and foregoing Petition for Certiorari to be served on the Honorable Garland D. Upton, who represented respondents in the prior proceedings had in this matter at his usual and last known mailing address.

Also, Section 28 U.S.C. 2403 may be applicable in this case and three copies of this Petition of Certiorari have been served on the Honorable William Allain, Mississippi State Attorney General.

Dated at Hattiesburg, Forrest County, Mississippi, this the 28 day of November, A. D. 1981.

John H. Anderson

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